

January 24, 2012

***Via Electronic Filing***

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation, RM-11510

Dear Ms. Dortch:

On January 23, 2012 Christopher Guttman McCabe of CTIA – The Wireless Association® (“CTIA”) left a detailed voice mail message for Roger Noel, Chief of the Mobility Division at the FCC’s Wireless Telecommunications Bureau. In the message, I discussed CTIA’s Petition for Rulemaking to transition Part 22 cellular licenses from site-based to geographic market-area licensing. Specifically, I expressed strong support for the Commission moving forward with a Notice of Proposed Rulemaking in this proceeding. I also raised concern with a proposal that would apply an overlay auction mechanism, possibly implemented as part of the transition from site-based to geographic licenses, for use on areas that are not substantially served.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed via ECFS with your office. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

*/s/ Christopher Guttman-McCabe*

Christopher Guttman-McCabe  
Vice President – Regulatory Affairs  
CTIA-The Wireless Association®

cc: Roger Noel